Crotty, P.

## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In Re the Application of NATALIA POTANINA

For an Order to Take Discovery Pursuant

to 28 U.S.C. § 1782(a)

No. 14-MC-31

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: \_\_\_\_
DATE FILED: February 25, 2014

## STIPULATION AND PROPOSED ORDER EXTENDING DISCOVERY DEADLINES

On February 3, 2014, this Court issued an Order permitting Natalia Potanina to issue subpoenas to individuals and entities, including Stone Tower Capital LLC, now known as Apollo ST Capital LLC ("Stone Tower"). The Order provided that if any Respondent wished to object to the Order or a subpoena, an appropriate motion to vacate and quash must be served and filed within 14 days after service of a subpoena on that Respondent.

Counsel for Mrs. Potanina and Respondent Stone Tower have engaged in discussions regarding the subpoena served on Stone Tower on February 7, 2014. The parties have made substantial progress in resolving the scope and timing of the response to the subpoena, and agree that it would be in both of the parties' interests to extend the deadline to move to vacate and quash until February 28, 2014 to allow the parties to fully resolve these issues without resort to motion practice.

Accordingly, Mrs. Potanina and Respondent Stone Tower hereby stipulate that the deadline to move to vacate the Order and to quash all or any part of the subpoena to Stone Tower shall be extended to February 28, 2014.

Respectfully submitted this 21st day of February 2014.

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SO ORDERED: 2-25-14

United States District Judge

PART, I

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